

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATE OF AMERICA

V.

DOCKET NO. 14-MJ-6126-MPK

R. DAVID COHAN

MOTION TO AMEND RELEASE CONDITIONS

NOW COMES the accused, R. David Cohan, by and through counsel and hereby moves this Court to amend his conditions of release to allow him to travel to New Hampshire for the purpose of meeting with the undersigned counsel and for the purpose of the accused meeting with his client, DeRosa Properties.

In support of this Motion, the accused states as follows:

1. The accused conditions of release do not allow him to travel outside of Massachusetts;
2. The undersigned counsel has an office in South Boston but also has an office in Londonderry, NH.
3. The accused is an attorney and has a client, DeRosa Properties, that is also located in Londonderry, NH.
4. The accused requests that his conditions of release be amended to permit him to travel to New Hampshire for the purpose of meeting with his attorney and/or meeting with his client, DeRosa Properties.
5. That the AUSA Ted Merritt has been contacted and assents to this motion.

WHEREFORE, the accused respectfully requests that this Court grant his motion and amend his conditions of release to allow him to travel to New Hampshire for the above stated purposes.

*Allowed
By Kelly
January 7, 2015*

Respectfully submitted,
R. David Cohen,
By His Attorney,

DATE: January 7, 2015

/s/ Paul J. Garrity
Paul J. Garrity